

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DR. ANNE THOMAS,

Plaintiff,

-against-

23-cv-08821-AT

VNS HEALTH

Defendant.

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DECLARATION OF CAROLINE F. SECOLA

I, Caroline F. Secola, Esquire, hereby declare as follows:

1. I am an attorney duly licensed to practice law in the State of New York and the United States District Court for the Southern District of New York. I am an Associate with the law firm of Florentino & Grimshaw LLC, counsel of record for Defendant Visiting Nurse Service of New York Home Care d/b/a VNS Health Home Care (“VNS Health”), incorrectly captioned as VNS Health in the above-captioned action.
2. Attached as **Exhibit A** is a true and correct copy of the Notice of Right to Sue that Plaintiff, Dr. Anne Thomas, was issued by the Equal Employment Opportunities Commission on November 28, 2023, with a copy to VNS Health.

I declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: Jersey City, New Jersey
January 24, 2024

Caroline F. Secola

Caroline F. Secola